

Fill in this information to identify the case:

Debtor 1 Jeffrey T. Esposito
Debtor 2 Helen J. Esposito
(Spouse, if filing)
United States Bankruptcy Court for the: Eastern District of PA (State)
Case number: 19-10915-amc

Official Form 4100R

Response to Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor response to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: First Heritage Financial Court Claim no. (if known) 22
Last 4 digits of any number you use to identify the debtor's account: XXXXXX4313
Property address: 1939 South Hollywood Street
Number Street
Philadelphia, PA 19145
City State Zip Code

Part 2: Prepetition Default Payments

Check One:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of the response is:

Part 3: Postpetition Mortgage Payment

Check One:

- ☒ Creditor agrees that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.
- The next postpetition payment from the debtor is on: 4/1/2024
MM/DD/YYYY
- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this responses is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payments that first became due on:

MM/DD/YYYY

Debtor 1 Jeffrey T. Esposito
First Name Middle Name Last Name

Case number: 19-10915-amc

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this notice must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x /s/ Christopher A. DeNardo Date: March 14, 2024
Signature

Print: Christopher A. DeNardo 78447 Title: Attorney for and on behalf of Midwest Loan Services (as servicer for creditor)
First Name Middle Name Last Name

Company LOGS Legal Group LLP

Address 985 Old Eagle School Road, Suite 514
Number Street
Wayne, PA 19087

City State ZIP Code

Contact phone (610) 278-6800 Email logsecf@logs.com

Certificate of Service

I hereby certify that a copy of the foregoing Response to Notice of Final Cure was served on the parties listed below by postage prepaid U.S. Mail, First Class or served electronically through the Court's ECF System at the e-mail address registered with the Court on this Date:

Date: March 14, 2024

Michael A. Cibik, Esquire
Cibik Law, P.C.
1500 Walnut Street
Suite 900
Philadelphia, PA 19102

Scott Waterman
Chapter 13 Trustee
2901 St. Lawrence Avenue, Suite 100
Reading, PA 19606

Jeffrey T. Esposito
1939 South Hollywood Street
Philadelphia, PA 19145

Helen J. Esposito
1939 South Hollywood Street
Philadelphia, PA 19145

/s/ Christopher A. DeNardo

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Heather Riloff - 309906
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